

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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KEISHA BROWN, As Administrator of the ESTATE OF AARON JENKINS	:	
	:	
v.	:	CIVIL ACTION NO.
	:	
	:	2:20-cv-05532-CMR
CITY OF PHILADELPHIA,	:	
PHILADELPHIA INTERNATIONAL	:	JURY TRIAL DEMANDED
AIRPORT, WORLDWIDE FLIGHT	:	
SERVICES, INC. and FRONTIER AIRLINES	:	

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**DEFENDANT CITY OF PHILADELPHIA’S REPLY TO  
CODEFENDANT WORLDWIDE FLIGHT SERVICES, INC.’S CROSSCLAIM  
FOR CONTRIBUTION AND/OR INDEMNIFICATION AGAINST  
DEFENDANTS CITY OF PHILADELPHIA AND PHILADELPHIA AIPORT**

Defendants, City of Philadelphia and Philadelphia Airport a/k/a Philadelphia International Airport (improperly sued as a defendant) (hereafter “City” or “Answering Defendants”), by and through its attorneys, Bennett, Bricklin & Saltzburg LLC, hereby replies to the Cross-Claim of Defendant Worldwide Flight Services, Inc. and states as follows:

1. Answering Defendants incorporate by reference their Answer to Plaintiff’s Amended Complaint as though set forth fully and at length herein.
2. Denied. The allegations contained in these paragraphs of Defendant Worldwide Flight Services, Inc.’s Cross-Claim are conclusions of law to which no response is required and the allegations are denied. To the extent that an answer may be deemed required, all allegations of primary liability, contribution, common law indemnification and/or contractual indemnification, or any liability for all or part of Plaintiff’s claims asserted against Answering Defendants, are specifically denied. Strict proof of these allegations is demanded at trial.
3. Denied. The allegations contained in these paragraphs of Defendant Worldwide

Flight Services, Inc.'s Cross-Claim are conclusions of law to which no response is required and the allegations are denied.

**BENNETT, BRICKLIN & SALTZBURG LLC**

*/s/ Michele E. Turner*

By:

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City of Philadelphia and  
Philadelphia Airport a/k/a  
Philadelphia International Airport  
(improperly sued as a defendant)*

Date: August 5, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Defendants, City of Philadelphia and Philadelphia Airport a/k/a Philadelphia International Airport's Reply to Worldwide Flight Services, Inc.'s Cross-Claim was served upon all counsel of record via ECF Notification and/or Email and/or Regular Mail on this date.

**BENNETT, BRICKLIN & SALTZBURG LLC**

*/s/ Michele E. Turner*

By:

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Date: August 5, 2021